

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CONVERGYS INFORMATION :
MANAGEMENT GROUP, INC., :
AND CHUBB CUSTOM :
INSURANCE COMPANY, :

Plaintiffs :

-v- : Case No. CV-01-618
: (Judge Beckwith)

IGATE CORPORATION, et al., :

Defendants :

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The deposition of **WILLIAM P. KOOPMANS**, taken before Melea E. Chaney, Court Reporter and Notary Public in and for the State of Ohio, at the law offices of Ulmer & Berne, 600 Vine Street, Suite 2800, Cincinnati, Ohio, on the 12th day of February, 2004, beginning at the hour of 9:23 a.m. and ending at the hour of 6:09 p.m. of the same date.

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1 Q Can you tell me what those changes in
2 procedures were? Well, let me ask you first: Were
3 they changes in procedure or some other change?

4 A They were -- some were changes in
5 procedure; some were environment changes.

6 Q Let's take them one at a time then.
7 Can you tell me what the changes in procedure were?

8 A The changes in procedure was to
9 implement more frequent tape backups of the archive log
10 file systems and moving those offsite.

11 Q You said the tapes of the archive logs?

12 A Yes.

13 Q Let me ask you: How frequently prior
14 to mid-September of 1999 were tapes of the archive logs
15 being made?

16 A Say that again. Sorry.

17 Q I thought you said you implemented a
18 more frequent --

19 A Yes.

20 Q -- backup.

21 A Correct. We went to, as I recall,
22 hourly backups.

23 Q Hourly backups of the archive logs?

24 A Yes.

25 Q And how frequent were the backups to

1 the archive logs prior to the mid-September 1999
2 events?

3 A I can't answer that precisely. Darin
4 or someone would have to --

5 Q You said another change -- was it the
6 backups were moved offsite or the backup was done
7 offsite?

8 A The -- the backup tapes are shipped
9 offsite.

10 Q What was the practice with respect to
11 the storage location of the backup tapes prior to the
12 mid-September of 1999 events?

13 A I believe they were still shipped
14 offsite. The frequency was not hourly.

15 Q Were there any other what you would
16 call procedural changes that were made by Convergys
17 with respect to the Sprint contract as a result of the
18 events of mid-September of 1999?

19 A Not that I can recall.

20 Q We had talked earlier and you had
21 talked about various processes to be followed,
22 including review of scripts and second set of eyes.

23 A Mm-hmm.

24 Q Was there anything done along those
25 lines by Convergys with respect to the Sprint project

1 functional document along these lines as a result of
2 the mid-September of 1999 events?

3 A Was there any change to the functional
4 roles and responsibility? That's what we do, what
5 functions we do. No.

6 Q Was there any other procedural change
7 that you can recall as a result of the September 1999
8 events as opposed to environment changes?

9 A Not that I can recall.

10 Q And would you describe for me what the
11 environment changes were that were made as a result of
12 the mid-September of 1999 events?

13 A There were two. One was an increase in
14 the space that was allocated to the archive log file
15 systems. I believe our target at the time was to make
16 those large enough to hold three days' worth of archive
17 logs.

18 Q And how large had they been before the
19 September '99 events?

20 A That's the answer I -- I didn't know.
21 It was more than 12 hours, but I don't know exactly.

22 Q And then the second environment change
23 was what?

24 A The second environment change was the
25 implementation of a standby database.

1 Q And what does that mean?

2 A A standby database is an Oracle feature
3 or capability where you have a copy of the production
4 database or the database that is your source that is
5 perpetually in recovery mode essentially, from a
6 simplistic term.

7 So it is not a database that's
8 available for access or query, it's in what Oracle
9 terms recovery mode and archive logs are shipped to
10 that database and applied so that it is just trailing
11 production.

12 Q You said this is an Oracle feature or
13 facility?

14 A Yes.

15 Q Was that Oracle feature or facility
16 available in September of 1999?

17 A I believe it was.

18 Q And I take it Convergys -- well, let me
19 ask. Did the Convergys system use it at the time?

20 A No.

21 Q And is there a reason why?

22 A A couple of reasons, as I recall.

23 There was a nontrivial amount of development. The --
24 the facility wasn't very mature from an Oracle
25 perspective, so you had to define or create processes

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C-E-R-T-I-F-I-C-A-T-I-O-N

STATE OF OHIO,

COUNTY OF WARREN, To-wit;

I, Melea E. Chaney, Court Reporter and Notary Public in and for the State of Ohio, do hereby certify;

That on the 12th day of February, 2003, there appeared before me pursuant to Notice and agreement of counsel, **WILLIAM P. KOOPMANS**, as a witness in the previously entitled cause;

That the said witness was sworn by me and examined to tell the truth, the whole truth, and nothing but the truth in said cause;

That the deposition was taken by me via Stenomask and electronic recording and the foregoing 319 pages contain a true, full and correct transcription of all the testimony of said witness;

That the deposition was submitted to counsel for the witness for reading and signature;

That I am not related to or in any way associated with any of the parties to said cause of action, or their counsel, and that I am not interested in the event thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of February, 2004.

Melea E. Chaney
My commission expires:
July 3, 2006